

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re)	Chapter 11
)	
W. R. GRACE & CO., <i>et al.</i>)	Case No. 01-1139 (JKF)
)	Jointly Administered
Debtors.)	
)	Re: Docket Nos. 22844, 24004
		12/14/09 Agenda Item No. 2

**CERTIFICATION OF COUNSEL REGARDING STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING PENDING MEDIATION (RE: GLORIA MUNOZ)**

1. On December 15, 2009, the Court entered the *Modified Order Granting in Part and Continuing Hearing with Regard to the Motion of Gloria Munoz for Relief from the Automatic Stay/Plan Injunctions* [Docket No. 24004] (the "Modified Order") setting February 1, 2010 as the deadline for Mediation to commence between Gloria Munoz and the Debtors. Additionally, the Order continued the hearing on the Munoz Motion to March 22, 2010.
2. As a result of scheduling conflicts between the parties, the earliest date available for Gloria Munoz and the Debtors to mediate is March 30, 2010.
3. The parties have agreed to continue the Motion until the April 12, 2010 omnibus hearing, subject to the terms and conditions set forth in the stipulation (the "Stipulation") attached as Exhibit 1 to the proposed Order attached hereto as Exhibit A.

4. Therefore, the Debtors respectfully request that the Court continue the *Motion of Gloria Munoz for Relief from the Automatic Stay/Plan Injunctions* [Docket No. 22844] to the April 12, 2010 omnibus hearing and approve the Stipulation entering the Order attached hereto as Exhibit A.

Dated: January 5, 2010

Respectfully submitted,

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